

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

MOBILEMEDIA IDEAS LLC,)
v. Plaintiff,) Civil Action No. 3:11-cv-02353-N
RESEARCH IN MOTION LIMITED and) JURY TRIAL DEMANDED
RESEARCH IN MOTION)
CORPORATION,)
Defendants.)

PLAINTIFF MMI'S ANSWER TO DEFENDANTS' COUNTERCLAIMS

Plaintiff MobileMedia Ideas LLC (“MMI”) hereby serves Defendants Research in Motion Limited and Research in Motion Corporation (“Defendants”) with Plaintiff MMI’s Answer to the Counterclaims (“Defendants’ Counterclaims”) asserted in Defendants’ Answer to MobileMedia Idea’s LLC’s Amended Complaint and Counterclaims filed on December 2, 2011 (Doc. 178).

ANSWER TO COUNTERCLAIMS

Unless otherwise expressly admitted, MMI denies each and every allegation in Defendants’ Counterclaims including, without limitation, any allegations in the headings, subheadings, preamble and prayer for relief. For its response to the numbered paragraphs of Defendants’ Counterclaims, MMI avers as follows:

THE PARTIES

1. Admits the allegations of paragraph 1 of Defendants’ Counterclaims.
2. Admits the allegations of paragraph 2 of Defendants’ Counterclaims.

3. Admits the allegations of paragraph 3 of Defendants' Counterclaims.

4. Admits the allegations of paragraph 4 of Defendants' Counterclaims.

5. Admits that Defendants' Counterclaims purport to arise under the patent laws of the United States, 35 U.S.C. § 101 *et seq.* and under the declaratory judgment act, 28 U.S.C. §§ 2201 and 2202.

6. Admits that this Court has subject matter jurisdiction over Defendants' Counterclaims pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. Admits the allegations of paragraph 7 of Defendants' Counterclaims.

FIRST CAUSE OF ACTION

8. Responding to paragraph 8 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

9. Admits the allegations of paragraph 9 of Defendants' Counterclaims.

10. Admits that MMI is the legal owner by assignment of the rights to the '476 Patent.

11. Paragraph 11 of Defendants' Counterclaims states a legal conclusion to which no response is required.

12. Denies the allegations of paragraph 12 of Defendants' Counterclaims.

13. Denies the allegations of paragraph 13 of Defendants' Counterclaims.

SECOND CAUSE OF ACTION

14. Responding to paragraph 14 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

15. Admits the allegations of paragraph 15 of Defendants' Counterclaims.

16. Admits that MMI is the legal owner by assignment of the rights to the '219 Patent.
17. Paragraph 17 of Defendants' Counterclaims states a legal conclusion to which no response is required.
18. Denies the allegations of paragraph 18 of Defendants' Counterclaims.
19. Denies the allegations of paragraph 19 of Defendants' Counterclaims.

THIRD CAUSE OF ACTION

20. Responding to paragraph 20 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

21. Admits the allegations of paragraph 21 of Defendants' Counterclaims.
22. Admits that MMI is the legal owner by assignment of the rights to the '439 Patent.

23. Paragraph 23 of Defendants' Counterclaims states a legal conclusion to which no response is required.

24. Denies the allegations of paragraph 24 of Defendants' Counterclaims.
25. Denies the allegations of paragraph 25 of Defendants' Counterclaims.

FOURTH CAUSE OF ACTION

26. Responding to paragraph 26 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

27. Admits the allegations of paragraph 27 of Defendants' Counterclaims.
28. Admits that MMI is the legal owner by assignment of the rights to the '075 Patent.

29. Paragraph 29 of Defendants' Counterclaims states a legal conclusion to which no response is required.

30. Denies the allegations of paragraph 30 of Defendants' Counterclaims.

31. Denies the allegations of paragraph 31 of Defendants' Counterclaims.

FIFTH CAUSE OF ACTION

32. Responding to paragraph 32 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

33. Admits the allegations of paragraph 33 of Defendants' Counterclaims.

34. Admits that MMI is the legal owner by assignment of the rights to the '078 Patent.

35. Paragraph 35 of Defendants' Counterclaims states a legal conclusion to which no response is required.

36. Denies the allegations of paragraph 36 of Defendants' Counterclaims.

37. Denies the allegations of paragraph 37 of Defendants' Counterclaims.

SIXTH CAUSE OF ACTION

38. Responding to paragraph 38 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

39. Admits the allegations of paragraph 39 of Defendants' Counterclaims.

40. Admits that MMI is the legal owner by assignment of the rights to the '231 Patent.

41. Paragraph 41 of Defendants' Counterclaims states a legal conclusion to which no response is required.

42. Denies the allegations of paragraph 42 of Defendants' Counterclaims.

43. Denies the allegations of paragraph 43 of Defendants' Counterclaims.

SEVENTH CAUSE OF ACTION

44. Responding to paragraph 44 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

45. Admits the allegations of paragraph 45 of Defendants' Counterclaims.

46. Admits that MMI is the legal owner by assignment of the rights to the '390 Patent.

47. Paragraph 47 of Defendants' Counterclaims states a legal conclusion to which no response is required.

48. Denies the allegations of paragraph 48 of Defendants' Counterclaims.

49. Denies the allegations of paragraph 49 of Defendants' Counterclaims.

EIGHTH CAUSE OF ACTION

50. Responding to paragraph 50 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

51. Admits the allegations of paragraph 51 of Defendants' Counterclaims.

52. Admits that MMI is the legal owner by assignment of the rights to the '394 Patent.

53. Paragraph 53 of Defendants' Counterclaims states a legal conclusion to which no response is required.

54. Denies the allegations of paragraph 54 of Defendants' Counterclaims.

55. Denies the allegations of paragraph 55 of Defendants' Counterclaims.

NINETH CAUSE OF ACTION

56. Responding to paragraph 56 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

57. Admits the allegations of paragraph 57 of Defendants' Counterclaims.

58. Admits that MMI is the legal owner by assignment of the rights to the '068 Patent.

59. Paragraph 59 of Defendants' Counterclaims states a legal conclusion to which no response is required.

60. Denies the allegations of paragraph 60 of Defendants' Counterclaims.

61. Denies the allegations of paragraph 61 of Defendants' Counterclaims.

TENTH CAUSE OF ACTION

62. Responding to paragraph 62 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

63. Admits the allegations of paragraph 63 of Defendants' Counterclaims.

64. Admits that MMI is the legal owner by assignment of the rights to the '301 Patent.

65. Paragraph 65 of Defendants' Counterclaims states a legal conclusion to which no response is required.

66. Denies the allegations of paragraph 66 of Defendants' Counterclaims.

67. Denies the allegations of paragraph 67 of Defendants' Counterclaims.

ELEVENTH CAUSE OF ACTION

68. Responding to paragraph 68 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

69. Admits the allegations of paragraph 69 of Defendants' Counterclaims.

70. Admits that MMI is the legal owner by assignment of the rights to the '080 Patent.

71. Paragraph 71 of Defendants' Counterclaims states a legal conclusion to which no response is required.

72. Denies the allegations of paragraph 72 of Defendants' Counterclaims.

73. Denies the allegations of paragraph 73 of Defendants' Counterclaims.

TWELTH CAUSE OF ACTION

74. Responding to paragraph 74 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

75. Admits the allegations of paragraph 75 of Defendants' Counterclaims.

76. Admits that MMI is the legal owner by assignment of the rights to the '012 Patent.

77. Paragraph 77 of Defendants' Counterclaims states a legal conclusion to which no response is required.

78. Denies the allegations of paragraph 78 of Defendants' Counterclaims.

79. Denies the allegations of paragraph 79 of Defendants' Counterclaims.

THIRTEENTH CAUSE OF ACTION

80. Responding to paragraph 80 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

81. Admits the allegations of paragraph 81 of Defendants' Counterclaims.

82. Admits that MMI is the legal owner by assignment of the rights to the '170 Patent.

83. Paragraph 83 of Defendants' Counterclaims states a legal conclusion to which no response is required.

84. Denies the allegations of paragraph 84 of Defendants' Counterclaims.

85. Denies the allegations of paragraph 85 of Defendants' Counterclaims.

FOURTEENTH CAUSE OF ACTION

86. Responding to paragraph 86 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

87. Admits the allegations of paragraph 87 of Defendants' Counterclaims.

88. Admits that MMI is the legal owner by assignment of the rights to the '796 Patent.

89. Paragraph 89 of Defendants' Counterclaims states a legal conclusion to which no response is required.

90. Denies the allegations of paragraph 90 of Defendants' Counterclaims.

91. Denies the allegations of paragraph 91 of Defendants' Counterclaims.

FIFTEENTH CAUSE OF ACTION

92. Responding to paragraph 92 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

93. Admits the allegations of paragraph 93 of Defendants' Counterclaims.

94. Admits that MMI is the legal owner by assignment of the rights to the '048 Patent.

95. Paragraph 95 of Defendants' Counterclaims states a legal conclusion to which no response is required.

96. Denies the allegations of paragraph 96 of Defendants' Counterclaims.

97. Denies the allegations of paragraph 97 of Defendants' Counterclaims.

SIXTEENTH CAUSE OF ACTION

98. Responding to paragraph 98 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

99. Admits the allegations of paragraph 99 of Defendants' Counterclaims.

100. Admits that MMI is the legal owner by assignment of the rights to the '828 Patent.

101. Paragraph 101 of Defendants' Counterclaims states a legal conclusion to which no response is required.

102. Denies the allegations of paragraph 102 of Defendants' Counterclaims.

103. Denies the allegations of paragraph 103 of Defendants' Counterclaims.

SEVENTEENTH CAUSE OF ACTION

104. Responding to paragraph 104 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

105. Paragraph 105 of Defendants' Counterclaims states a legal conclusion to which no response is required.

106. Denies the allegations of paragraph 106 of Defendants' Counterclaims.

107. Denies the allegations of paragraph 107 of Defendants' Counterclaims.

EIGHTEENTH CAUSE OF ACTION

108. Responding to paragraph 108 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

109. Paragraph 109 of Defendants' Counterclaims states a legal conclusion to which no response is required.

110. Denies the allegations of paragraph 110 of Defendants' Counterclaims.

111. Denies the allegations of paragraph 111 of Defendants' Counterclaims.

NINETEENTH CAUSE OF ACTION

112. Responding to paragraph 112 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

113. Paragraph 113 of Defendants' Counterclaims states a legal conclusion to which no response is required.

114. Denies the allegations of paragraph 114 of Defendants' Counterclaims.

115. Denies the allegations of paragraph 115 of Defendants' Counterclaims.

TWENTIETH CAUSE OF ACTION

116. Responding to paragraph 116 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

117. Paragraph 117 of Defendants' Counterclaims states a legal conclusion to which no response is required.

118. Denies the allegations of paragraph 118 of Defendants' Counterclaims.

119. Denies the allegations of paragraph 119 of Defendants' Counterclaims.

TWENTY-FIRST CAUSE OF ACTION

120. Responding to paragraph 120 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

121. Paragraph 121 of Defendants' Counterclaims states a legal conclusion to which no response is required.

122. Denies the allegations of paragraph 122 of Defendants' Counterclaims.

123. Denies the allegations of paragraph 123 of Defendants' Counterclaims.

TWENTY-SECOND CAUSE OF ACTION

124. Responding to paragraph 124 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

125. Paragraph 125 of Defendants' Counterclaims states a legal conclusion to which no response is required.

126. Denies the allegations of paragraph 126 of Defendants' Counterclaims.

127. Denies the allegations of paragraph 127 of Defendants' Counterclaims.

TWENTY-THIRD CAUSE OF ACTION

128. Responding to paragraph 128 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

129. Paragraph 129 of Defendants' Counterclaims states a legal conclusion to which no response is required.

130. Denies the allegations of paragraph 130 of Defendants' Counterclaims.

131. Denies the allegations of paragraph 131 of Defendants' Counterclaims.

TWENTY-FOURTH CAUSE OF ACTION

132. Responding to paragraph 132 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

133. Paragraph 133 of Defendants' Counterclaims states a legal conclusion to which no response is required.

134. Denies the allegations of paragraph 134 of Defendants' Counterclaims.

135. Denies the allegations of paragraph 135 of Defendants' Counterclaims.

TWENTY-FIFTH CAUSE OF ACTION

136. Responding to paragraph 136 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

137. Paragraph 137 of Defendants' Counterclaims states a legal conclusion to which no response is required.

138. Denies the allegations of paragraph 138 of Defendants' Counterclaims.

139. Denies the allegations of paragraph 139 of Defendants' Counterclaims.

TWENTY-SIXTH CAUSE OF ACTION

140. Responding to paragraph 140 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

141. Paragraph 141 of Defendants' Counterclaims states a legal conclusion to which no response is required.

142. Denies the allegations of paragraph 142 of Defendants' Counterclaims.

143. Denies the allegations of paragraph 143 of Defendants' Counterclaims.

TWENTY-SEVENTH CAUSE OF ACTION

144. Responding to paragraph 144 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

145. Paragraph 145 of Defendants' Counterclaims states a legal conclusion to which no response is required.

146. Denies the allegations of paragraph 146 of Defendants' Counterclaims.

147. Denies the allegations of paragraph 147 of Defendants' Counterclaims.

TWENTY-EIGHTH CAUSE OF ACTION

148. Responding to paragraph 148 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

149. Paragraph 149 of Defendants' Counterclaims states a legal conclusion to which no response is required.

150. Denies the allegations of paragraph 150 of Defendants' Counterclaims.

151. Denies the allegations of paragraph 151 of Defendants' Counterclaims.

TWENTY-NINTH CAUSE OF ACTION

152. Responding to paragraph 152 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

153. Paragraph 153 of Defendants' Counterclaims states a legal conclusion to which no response is required.

154. Denies the allegations of paragraph 154 of Defendants' Counterclaims.

155. Denies the allegations of paragraph 155 of Defendants' Counterclaims.

THIRTIETH CAUSE OF ACTION

156. Responding to paragraph 156 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

157. Paragraph 157 of Defendants' Counterclaims states a legal conclusion to which no response is required.

158. Denies the allegations of paragraph 158 of Defendants' Counterclaims.

159. Denies the allegations of paragraph 159 of Defendants' Counterclaims.

THIRTY-FIRST CAUSE OF ACTION

160. Responding to paragraph 160 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

161. Paragraph 161 of Defendants' Counterclaims states a legal conclusion to which no response is required.

162. Denies the allegations of paragraph 162 of Defendants' Counterclaims.

163. Denies the allegations of paragraph 163 of Defendants' Counterclaims.

THIRTY-SECOND CAUSE OF ACTION

164. Responding to paragraph 164 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

165. Paragraph 165 of Defendants' Counterclaims states a legal conclusion to which no response is required.

166. Denies the allegations of paragraph 166 of Defendants' Counterclaims.

167. Denies the allegations of paragraph 167 of Defendants' Counterclaims.

THIRTY-THIRD CAUSE OF ACTION

168. Responding to paragraph 168 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

169. Paragraph 169 of Defendants' Counterclaims states a legal conclusion to which no response is required.

170. Denies the allegations of paragraph 170 of Defendants' Counterclaims.

171. Denies the allegations of paragraph 171 of Defendants' Counterclaims.

THIRTY-FOURTH CAUSE OF ACTION

172. Responding to paragraph 172 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

173. Paragraph 173 of Defendants' Counterclaims states a legal conclusion to which no response is required.

174. Denies the allegations of paragraph 174 of Defendants' Counterclaims.

175. Denies the allegations of paragraph 175 of Defendants' Counterclaims.

THIRTY-FIFTH CAUSE OF ACTION

176. Responding to paragraph 176 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

177. Paragraph 177 of Defendants' Counterclaims states a legal conclusion to which no response is required.

178. Denies the allegations of paragraph 178 of Defendants' Counterclaims.

179. Denies the allegations of paragraph 179 of Defendants' Counterclaims.

THIRTY-SIXTH CAUSE OF ACTION

180. Responding to paragraph 180 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

181. Paragraph 181 of Defendants' Counterclaims states a legal conclusion to which no response is required.

182. Denies the allegations of paragraph 182 of Defendants' Counterclaims.

183. Denies the allegations of paragraph 183 of Defendants' Counterclaims.

THIRTY-SEVENTH CAUSE OF ACTION

184. Responding to paragraph 184 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

185. Paragraph 185 of Defendants' Counterclaims states a legal conclusion to which no response is required.

186. Denies the allegations of paragraph 186 of Defendants' Counterclaims.

187. Denies the allegations of paragraph 187 of Defendants' Counterclaims.

THIRTY-EIGHTH CAUSE OF ACTION

188. Responding to paragraph 188 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

189. Paragraph 189 of Defendants' Counterclaims states a legal conclusion to which no response is required.

190. Denies the allegations of paragraph 190 of Defendants' Counterclaims.

191. Denies the allegations of paragraph 191 of Defendants' Counterclaims.

THIRTY-NINTH CAUSE OF ACTION

192. Responding to paragraph 192 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

193. Paragraph 193 of Defendants' Counterclaims states a legal conclusion to which no response is required.

194. Denies the allegations of paragraph 194 of Defendants' Counterclaims.

195. Denies the allegations of paragraph 195 of Defendants' Counterclaims.

FORTIETH CAUSE OF ACTION

196. Responding to paragraph 196 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

197. Paragraph 197 of Defendants' Counterclaims states a legal conclusion to which no response is required.

198. Denies the allegations of paragraph 198 of Defendants' Counterclaims.

199. Denies the allegations of paragraph 199 of Defendants' Counterclaims.

FORTY-FIRST CAUSE OF ACTION

200. Responding to paragraph 200 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

201. Paragraph 201 of Defendants' Counterclaims states a legal conclusion to which no response is required.

202. Denies the allegations of paragraph 202 of Defendants' Counterclaims.

203. Denies the allegations of paragraph 203 of Defendants' Counterclaims.

FORTY-SECOND CAUSE OF ACTION

204. Responding to paragraph 204 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

205. Paragraph 205 of Defendants' Counterclaims states a legal conclusion to which no response is required.

206. Denies the allegations of paragraph 206 of Defendants' Counterclaims.

207. Denies the allegations of paragraph 207 of Defendants' Counterclaims.

FORTY-THIRD CAUSE OF ACTION

208. Responding to paragraph 208 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

209. Paragraph 209 of Defendants' Counterclaims states a legal conclusion to which no response is required.

210. Denies the allegations of paragraph 210 of Defendants' Counterclaims.

211. Denies the allegations of paragraph 211 of Defendants' Counterclaims.

FORTY-FOURTH CAUSE OF ACTION

212. Responding to paragraph 212 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

213. Paragraph 213 of Defendants' Counterclaims states a legal conclusion to which no response is required.

214. Denies the allegations of paragraph 214 of Defendants' Counterclaims.

215. Denies the allegations of paragraph 215 of Defendants' Counterclaims.

FORTY-FIFTH CAUSE OF ACTION

216. Responding to paragraph 216 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

217. Paragraph 217 of Defendants' Counterclaims states a legal conclusion to which no response is required.

218. Denies the allegations of paragraph 218 of Defendants' Counterclaims.

219. Denies the allegations of paragraph 219 of Defendants' Counterclaims.

FORTY-SIXTH CAUSE OF ACTION

220. Responding to paragraph 220 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

221. Paragraph 221 of Defendants' Counterclaims states a legal conclusion to which no response is required.

222. Denies the allegations of paragraph 222 of Defendants' Counterclaims.

223. Denies the allegations of paragraph 223 of Defendants' Counterclaims.

FORTY-SEVENTH CAUSE OF ACTION

224. Responding to paragraph 224 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

225. Paragraph 225 of Defendants' Counterclaims states a legal conclusion to which no response is required.

226. Denies the allegations of paragraph 226 of Defendants' Counterclaims.

227. Denies the allegations of paragraph 227 of Defendants' Counterclaims.

FORTY-EIGHTH CAUSE OF ACTION

228. Responding to paragraph 228 of Defendants' Counterclaims, MMI repeats its responses to the allegations of paragraphs 1 through 7 of Defendants' Counterclaims as though those responses were specifically restated here.

229. Paragraph 229 of Defendants' Counterclaims states a legal conclusion to which no response is required.

230. Denies the allegations of paragraph 230 of Defendants' Counterclaims.

231. Denies the allegations of paragraph 231 of Defendants' Counterclaims.

REQUEST FOR RELIEF

MMI denies that Defendants RIM Ltd. and RIM Corp. are entitled to the relief they request.

PLAINTIFF MMI'S AFFIRMATIVE DEFENSE

Defendants' Counterclaims fail to state a claim upon which relief can be granted.

PRAYER FOR RELIEF

WHEREFORE, MMI respectfully request entry of judgment in its favor and against Defendants as follows:

- A. That each and every one of Defendants' Counterclaims be dismissed with prejudice;
- B. That the Court enter judgment adjudging, finding and declaring this to be an exceptional case in view of the meritless nature of some or all of Defendants' Counterclaims, and awarding MMI its reasonable attorneys' fees, costs, and disbursements pursuant to 35 U.S.C. § 285; and

C. That the Court grant MMI such other and further relief as this Court may deem just and proper.

Dated: December 19, 2011

Respectfully submitted,

LYNN TILLOTSON PINKER & COX, LLP

/s/ Mark E. Turk

Michael P. Lynn
State Bar No. 12738500
Email: mlynn@lynllp.com
Eric W. Pinker, P.C.
State Bar No. 16016550
Email: epinker@lynllp.com
Mark E. Turk
State Bar No. 00786298
Email: mturk@lynllp.com
LYNN TILLOTSON PINKER & COX, LLP
2100 Ross Avenue, Suite 2700
Dallas, Texas 75201
Telephone: (214) 981-3800
Fascimile: (214) 981-3839

Garrard R. Beeney
Adam R. Brebner
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
(212) 558-4000

Kenneth Rubenstein
PROSKAUER ROSE LLP
11 Times Square
New York, New York 10036
(212) 969-3000

*Attorneys for Plaintiff
MobileMedia Ideas LLC*

CERTIFICATE OF SERVICE

I hereby certify that, on December 19, 2011, a true and correct copy of the above document was filed through the CM/ECF system of the Northern District of Texas and was served by that system on all counsel of record.

/s/ Mark E. Turk

Mark E. Turk